



**JEWISH  
SOCIAL  
SERVICE  
AGENCY**  
OF METROPOLITAN  
WASHINGTON

*Caring  
for  
Each Other*

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SUPPORTED AGENCY



June 8, 2005

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The Honorable Robert E. Nicolay  
Chairman, Certificate of Need Task Force  
Maryland Health Care Commission  
4160 Patterson Avenue  
Baltimore, MD 21215

Dear Commissioner Nicolay:

The Jewish Social Service Agency (JSSA) Hospice appreciates the opportunity to present its views on the Certificate of Need (CON) process for hospice care to the Health Care Commissions Certificate of Need Task Force. ***JSSA strongly requests that the Task Force recommend that the Commission maintain the current CON process for hospice.*** Our position is well expressed by the Hospice Network of Maryland, but we felt it would be useful for you to realize the potential impact of altering the current CON process on a small, high quality, community based, non-profit Hospice.

The Jewish Social Service Agency (JSSA) is a non-profit agency which has provided care to the community for over 111 years. Last year alone, JSSA provided health, mental health, employment and other social services to over 12,000 clients in Maryland through four offices in Montgomery County. JSSA has offered hospice services since 1984 on a fully non-sectarian basis. JSSA's Hospice has become symbolic of the Jewish community's commitment to care for the entire community.

Non-profit agencies such as JSSA which operate relatively small but very comprehensive services go the extra mile in supporting families who are facing terminal illness and want to care for their loved ones at home. We fundraise extensively to leverage Medicare, Medicaid and other insurance reimbursement so that Hospice clients can have the high quality care they need as they struggle to support their children, spouses and other family members at such a critical time. JSSA provides a host of ancillary services from Meals on Wheels to specialized counseling for children.

Why is it so important to sustain the CON process?

- If the CON process is not preserved, the State will be placing community hospices with long histories of top-notch quality, prompt responsiveness and charitable support for poor clients in jeopardy. Outside agencies may come in, force small agencies such as JSSA out of business, and then leave when they realize hospice is not the profit center they counted on.

child evaluation and treatment • counseling and therapy • hospice care • older adult services • special needs services  
career and employment services • newcomer resettlement • adoption services • educational scholarships and loans  
Jewish Chaplaincy Services




- Non-profit, community based hospices such as JSSA provide gem-like quality of care. We are rooted in the community and can mobilize volunteers, fundraising dollars, and frankly, are held accountable to careful Board oversight on quality of care and commitment. At the same time, we are JCAHO Accredited and meet all State and Federal regulations.
- Local non-profit hospices like JSSA cannot commit extraordinary money to slick marketing campaigns. We are well known by all the local hospitals and referral sources and reserve our precious dollars for patient and family care.
- Local non-profit hospices are already struggling with the shortage of qualified nurses and competition for charitable dollars. Allowing state wide, outside hospices to come into this area would jeopardize the very existence of community based hospices which have superb reputations and equally importantly, are able to absorb patients in need.
- JSSA's Hospice has very gifted nurses who are available 24 hours a day, 7 days a week, 365 days a year. When a family calls us in the middle of the night, or on a Sunday, we are able to make a home visit within a ½ hour. JSSA and other local non-profit hospices have proven they can do this.
- There is only a compelling need for competition if the quality of care is lacking, if the availability of service is a problem, and if the price of care is not competitive. In Montgomery County, none of these problems exist!

In summary, maintaining the current CON process would prevent a situation that threatens to undermine the incredible commitment and stability, indeed very survival, of the current high quality providers of hospice by opening the market to other companies who do not have the community knowledge or dedication we have proven.

Thank you so much for your consideration.

Sincerely,



Joan G. de Pontet, LCSW-C  
Executive Director

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